

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

**DECLARATION OF CHRISTOPHER
CHIOU IN SUPPORT OF OMNIBUS
SEALING STIPULATION
REGARDING DKT. NOS. 1540 AND
1542**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

I, Christopher Chiou, declare as follows:

1. I am a partner at the law firm of Wilson Sonsini Goodrich & Rosati and attorney of record for Defendants YouTube, LLC and Google LLC (collectively (“YouTube”) in *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, Case No.: 4:22-md-03047-YGR. I am licensed to practice law in the state of California and am admitted to practice before this Court. I submit this declaration in support of the Omnibus Sealing Stipulation in connection with the Parties’ Joint Letter Brief re Certain Noncustodial YouTube Databases (ECF No. 1540) and Joint Letter Brief re RFP Nos. 37 and 50 (Account Sign Up and Cancellation Interfaces) (ECF No. 1542). I have personal knowledge of the facts set forth in this

1 declaration, and I could and would testify competently to their truth if called upon to do so.

2 2. On January 14, 2025, the Parties filed the Parties' Joint Letter Brief re Certain
 3 Noncustodial YouTube Databases and its Exhibit (ECF No. 1540) and Joint Letter Brief re RFP
 4 Nos. 37 and 50 (Account Sign Up and Cancellation Interfaces) (ECF No. 1542).

5 3. I have reviewed the documents that YouTube seeks to seal pursuant to the Court's
 6 Order Granting Motion to File Under Seal; Setting Sealing Procedures (ECF No. 341). Based on
 7 my review of the documents and in consultation with YouTube, I understand there is good cause
 8 to seal the following information:

Dkt. No.	Description	Basis for Sealing
1540-1	Joint Letter Brief re Certain Noncustodial YouTube Databases redacted at 1–4	The redacted portions consist of sensitive and confidential information about YouTube's platform, repository, and tool design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
1540-2	Exhibit A filed under seal	The exhibit consists of sensitive and confidential information about YouTube's platform, repository, and tool design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
1542-1	Joint Letter Brief re RFP Nos. 37 and 50 (Account Sign Up and Cancellation Interfaces) redacted at 2, 4	The redacted portions consist of sensitive and confidential information about YouTube's platform design. Disclosure of the information would provide competitors with insights into YouTube's business they

1		would not otherwise have,
2		include trade secrets and
3		competitive information, and
		thereby cause competitive
		harm to YouTube.

4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct. Executed at Los Angeles, California on January 29, 2024.
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/s/ Christopher Chiou
Christopher Chiou